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Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
And RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
No. 23-cv-06708

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF LAURA VARTAIN
HORN IN SUPPOT OF DEFENDANTS UBER
TECHNOLOGIES, INC., RASIER, LLC, AND
RASIER-CA, LLC'S OPPOSITION TO
PLAINTIFF'S MOTION TO PRECLUDE
UBER FROM "CHERRY-PICKING"
CORPORATE TRIAL WITNESSES AND
FROM CALLING AT TRIAL CERTAIN
WITNESSES**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

**DECLARATION OF LAURA VARTAIN HORN ISO DEFENDANTS' OPPOSITION TO
PLAINTIFF'S MOTION TO PRECLUDE**

Case No. 3:23-md-03084-CRB (LJC)

1 I, Laura Vartain Horn, declare as follows:

2 1. I am an attorney at law duly admitted to practice before the courts of the State of California
3 and a partner with the law firm of Kirkland & Ellis LLP, counsel of record for Defendants Uber
4 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”) in this action. I have personal
5 knowledge of each and all of the facts stated in this declaration and, if called as a witness, could and would
6 competently testify to the facts contained herein.

7 2. Attached as **Exhibit 1** is a true and correct copy of excerpts of the Deposition Transcript
8 of Chad Dobbs, dated August 21, 2025.

9 3. Attached as **Exhibit 2** is a true and correct copy of excerpts of the Deposition Transcript
10 of Sunny Wong, dated October 14, 2025.

11 4. Attached as **Exhibit 3** is a true and correct copy of excerpts of the Deposition Transcript
12 of Gus Fuldner, dated April 29, 2025.

13 5. Attached as **Exhibit 4** is a true and correct copy of excerpts of the Deposition Transcript
14 of Gus Fuldner, dated March 27, 2025.

15 6. Attached as **Exhibit 5** is a true and correct copy of excerpts of the Deposition Transcript
16 of Katy McDonald, dated May 7, 2025.

17 7. Attached as **Exhibit 6** is a true and correct copy of excerpts of the Declaration of Todd
18 Gaddis, dated December 4, 2025.s

19 8. Attached as **Exhibit 7** is a true and correct copy of an email from Kim Bueno to Roopal
20 Luhana and Ellyn Hurd, dated December 15, 2025.

21 9. Attached as **Exhibit 8** is a true and correct copy of excerpts of the Deposition Transcript
22 of Greg Brown, dated July 15, 2025.

23 10. Attached as **Exhibit 9** is a true and correct copy of excerpts of the Deposition Transcript
24 of Greg Brown, dated July 16, 2025.

25 11. Attached as **Exhibit 10** is a true and correct copy of an email from Ellyn Hurd to Kim
26 Bueno and Roopal Luhana, dated December 15, 2025.

1 I declare under penalty of perjury under the laws of the United States and the State of California
2 that the foregoing is true and correct.

3 Executed on December 17, 2025, in San Francisco, California.

4 /s/ Laura Vartain Horn

5 Laura Vartain Horn
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